

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

HORACE MORRIS, et al.

Civil Docket Number: 18-cv-05321

PLAINTIFFS,

**FOURTH NOTICE OF AMENDMENT**

v.

ISLAMIC REPUBLIC OF IRAN,

ECF CASE

DEFENDANT.

This document relates to:

*Horace Morris, et al. v. Islamic Republic of Iran, No. 1:18-cv-05321 (GBD) (SN).*

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 6 (the “Underlying Complaint”), as permitted and approved by the Court’s Order of May 25, 2018, ECF No. 4010, read with the Order dated April 27, 2018, ECF No. 3982. Upon the filing of this Notice of Amendment, the Underlying Complaint is deemed amended to add the individuals listed below (the “New Plaintiffs”) as plaintiffs raising claims against the Islamic Republic of Iran, and adopting the factual allegations, jurisdictional allegations, and jury trial demand of the Underlying Complaint and *Burnett Iran* Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53), as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the Underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

### CAUSES OF ACTION

The New Plaintiffs hereby adopt and incorporate herein by reference the causes of action set forth in the Underlying Complaint and the *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53).

New Plaintiffs are making such claim on the following basis, and incorporate by reference that supplemental information provided in the Identification of New Plaintiffs below, identifying the New Plaintiffs asserted basis for participating in this suit:

- ☐ Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

### IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the Underlying Complaint discussing the decedent and/or the decedent's estate.

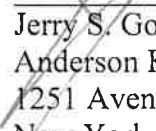
	<b>New Plaintiff's Last Name, First Name</b>	<b>State of Residency at Filing (or death)</b>	<b>Citizenship/ Nationality on 9/11/2001</b>	<b>Decedent's Name (alphabetical by last name)</b>	<b>New Plaintiff's Relationship to Decedent</b>	<b>Paragraphs of Complaint Discussing Decedent</b>  <b>1:18-cv-05321</b>
175	Ramsaur, Ann	PA	United States	Ramsaur, Deborah	Daughter	¶ 49
176	Ramsaur, Brian	PA	United States	Ramsaur, Deborah	Son	¶ 49
177	Jonas, Mark	GA	United States	Rezke, Martha M.	Son	¶ 50

	<b>New Plaintiff's Last Name, First Name</b>	<b>State of Residency at Filing (or death)</b>	<b>Citizenship/ Nationality on 9/11/2001</b>	<b>Decedent's Name (alphabetical by last name)</b>	<b>New Plaintiff's Relationship to Decedent</b>	<b>Paragraphs of Complaint Discussing Decedent</b>  <b>1:18-cv-05321</b>
178	Dicola, Lina	VA	United States	Rezke, Martha M	Daughter	¶ 50
179	Riccardelli, Genevieve	NJ	United States	Riccardelli, Francis	Daughter	¶ 52
180	Riccardelli, Christiana	NJ	United States	Riccardelli, Francis	Daughter	¶ 52
181	Riccardelli, Marielle	NJ	United States	Riccardelli, Francis	Daughter	¶ 52
182	Riccardelli, Meghan	NJ	United States	Riccardelli, Francis	Daughter	¶ 52
183	Riccardelli, Zachary	NJ	United States	Riccardelli, Francis	Son	¶ 52
184	Keegan, Francis	NY	United States	Rice, Eileen M.	Brother	¶ 53
185	Rice, Lesli	NJ	United States	Rice, Eileen M.	Daughter	¶ 53
186	Bergen, Quenna	NJ	United States	Richards, Venesha	Sister	¶ 59
187	Richards, Kayla	NJ	United States	Richards, Venesha	Daughter	¶ 59
188	Rodgers, Omar	NJ	United States	Richards, Venesha	Sister	¶ 59
189	Bergen, Lelith	NJ	United States	Richards, Venesha	Brother	¶ 59
190	Bergen, Naquan	NJ	United States	Richards, Venesha	Brother	¶ 59
191	Rivera, Britney	NY	United States	Rivera, Carmen A.	Daughter	¶ 62
192	Rivera, Luis Jr.	NY	United States	Rivera, Carmen A.	Son	¶ 62
193	Concepcion, Racine	NJ	United States	Rivera, Carmen A.	Daughter	¶ 62
194	Rivera, Rafael J.	FL	United States	Rivera, Linda I.	Brother	¶ 63
195	Rivera, Carmen	FL	United States	Rivera, Linda I.	Mother	¶ 63
196	Rivera, Rafael A.	FL	United States	Rivera, Linda I.	Brother	¶ 63
197	Valdez, Anibal	NY	United	Rodriguez, Mayra	Brother	¶ 69

	<b>New Plaintiff's Last Name, First Name</b>	<b>State of Residency at Filing (or death)</b>	<b>Citizenship/ Nationality on 9/11/2001</b>	<b>Decedent's Name (alphabetical by last name)</b>	<b>New Plaintiff's Relationship to Decedent</b>	<b>Paragraphs of Complaint Discussing Decedent</b>  <b>1:18-cv-05321</b>
			States	V.		
198	Valdez, Jose	NY	United States	Rodriguez, Mayra V.	Brother	¶ 69
199	Valdez, Lydia	NY	United States	Rodriguez, Mayra V.	Mother	¶ 69

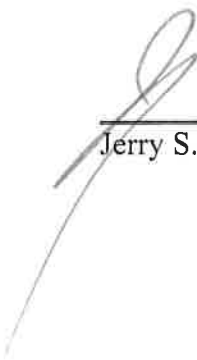
Dated: June 16, 2018

Respectfully submitted,

  
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 COUNSEL FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that on June ~~4~~<sup>14</sup>, 2018, I caused the foregoing Notice of Amendment, to be served via the Court's ECF system to all counsel of record in Case Number 03-MDL-1570 (GBD) (SN).

  
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Jerry S. Goldman